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54 Century Lane Montross, Virginia 22520 January 25, 2002

NAR 15 2732

Secretary
Federal Communications Commission
Washington, D. C. 20554

IN RE: RM-10354

Dear Mm. Salas:

In further response to the Commission's request for comments on the undersigned's petitition (RM-10354) published for comment on January 8, 2002, I am enclosing:

- (1) An undated announcement from the Radio Society of Great Britain (RSGB) explaining a new structure for amateur radio licensing in the United Kingdom which went into effect on January 1, 2002; and
- (2) an "Amateur Radio (Foundation) Licence Information Sheet" dated December 10, 2001, and released by the Radiocommunications Agency of the British Government.

I request that both documents be included in the record of the proceeding.

Further, I point out that the charges in the British licensing program outlined in the documents are reflective of the kind of positive, public-interest-oriented thinking which I am trying to encourage the Commission to undertake. The aim of the changes in the U.K. is clearly stated to EMERREMENT encourage young people to explore the radio amateur hobby by providing attractive options for them to operate in all modes on all available frequencies as soon as they become licensed. Instead, the Commission's current licensing program places hurdles in the way of new entrants and to my way of thinking actually discourages science-minded young people from pursuing amateur radio as a complement to their studies. This antiquated thinking needs to be changed, and changed quickly.

Sincerely.

John S. Rippey

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A New Structure for Amateur Radio Licensing in the UK

The RSGB and the Radiocommunications Agency have made a joint announcement outlining a series of changes to amateur radio licensing, which are designed to make amateur radio more attractive as a technical hobby. The changes include lowering the Morse code speed requirement for full licensees, amalgamating some licence categories, allowing trainees to operate while supervised before passing an examination, and the introduction of a new Foundation Class licence.

In brief, the following are the changes being introduced:

The Morse requirement for the Class A licence is being reduced to five words per minute with immediate effect and the Class A/B licence is being incorporated into the Class A licence. Class A/B licence holders will be offered the choice of either retaining their existing M5 callsign or changing to an M0 callsign.

Additionally, to encourage the practical aspect of amateur radio training, unlicensed trainees on a registered training course may be supervised by full licence-holders to operate a station and contact other UK licensed amateurs. There will be no time limit on the duration of any message.

With effect from the 1st of October 2001, the Novice Amateur Radio Licence will be re-named the 'Intermediate Amateur Radio Licence'. Intermediate (A) licensees will be allowed access to all amateur radio bands.

Intermediate (B) will be allowed access to all amateur bands at 50MHz and above. All Intermediate licensees will be allowed 50 watts output in all bands except where a lower power limit already applies to Amateur (A) licensees, in which case the lower level shall apply.

The final change to the amateur radio licensing structure prior to the World Radio Conference in 2003 will be the introduction of a new 'Foundation' licence at the beginning of 2002. This licence will provide access to most of the amateur bands, and restrict licensees to a maximum power of 10 watts RF output. Transmitting equipment will need to be commercially-manufactured items, or properly-designed commercial kits.

Study for the Foundation licence may be undertaken over a weekend, and is based on the tradition that amateur radio is a hobby learnt mainly through self-training. With effect from the 1st of October 2001, pilot courses will be run to evaluate the syllabus and training material, and the RA expects the full scheme to be operational from January 2002. The RSGB is working with the RA to organise these pilot courses, and will be handling much of the routine administration of the training and examination process, with the Agency remaining the licensing authority. It is hoped that by taking this first step onto the licensing ladder, Foundation licensees will be encouraged to undertake a process of self-training to acquire higher licence privileges in due course.

AMATEUR RADIO (FOUNDATION) LICENCE INFORMATION SHEET

Introduction

The Foundation Licence has been designed and introduced for people of all ages and abilities. To take the associated training course you do not need to have any formal qualifications to be able to benefit from this interesting hobby. The aim of the Foundation Licence is to facilitate a simple entry into Amateur Radio as a hobby where you will be able to make friends from all walks of life. We hope that as experience and confidence increases, Foundation Licensees will progress up the Amateur Radio ladder to obtain a more advanced Amateur Licence, with all the attendant privileges.

This information sheet aims to answer the most popular questions about how to become a Foundation Licensee and how it fits within the amateur radio licensing system. The questions are by no means comprehensive, and if you would like some further information on Amateur Radio as a hobby, please contact the Radiocommunications Agency at the number on the last page

Q1. Why do I need a licence?

A. It is a legal requirement under the Wireless Telegraphy Act 1949. You must first obtain a licence from the Radiocommunications Agency before you may legally send and receive messages by radio, unless you are operating under the direct supervision of a full licensee. The licence terms, provisions and limitations document BR68/F sets out the conditions that apply.

- Q2. What is the difference between a radio amateur and a person who operates Citizens' Band (CB) Radio?
- A. A CB licensee does not have to pass any examinations or obtain any qualifications before being allowed to operate. The service is short range, with a limited coverage area and may be used for some business purposes, e.g. taxi companies. Amateur radio, especially in the HF bands, can enable an amateur to make a contact with other countries, but business use is not allowed.
- Q3. What frequencies can a Foundation Licensee use?
- A. The frequencies are set out in BR68/F, a draft copy of which is enclosed in

this information pack.

- Q4. What will the foundation licence enable me to do?
- A. The Foundation licence will allow you to operate amateur radio within the limitations set out in BR68/F.
- Q5. What qualifications do I need?
- A. You will need to have completed a training course of approximately 10 hrs in duration followed by an assessment consisting of 20 multiple-choice questions administered by a registered body (such as a local amateur radio club). The qualification will be on 'a know what do to' basis.
- Q6. Will knowledge of the Morse code be necessary?
- A. The International Radio Regulations require that, to operate on the HF frequencies, the operator must "demonstrate an ability to send correctly by hand and to receive correctly by ear, texts in Morse code signals". In practice, this will consist of a simple assessment using crib sheets to encode messages into Morse, for example?? is the letter A, so you would look at the crib sheet, write down the letter A as a dot and a dash and then send it. The same would work in reverse when decoding a series of dots and dashes you write them down and using the crib sheet, translate them into letters.
- Q7. What does the training course consist of?
- A. The course will be quite straightforward and will focus on safety, avoiding interference and good operating practice, and will last about 10 hours. A copy of the syllabus is enclosed in this information pack.
- Q8. Could a home designed and built transmitter be used by a foundation licensee if it is 'signed off' by an existing licensee?
- A. No. The use of Home built transmitters (i.e. equipment constructed by the amateur without using commercially produced kits) will not be allowed under the Foundation licence. The reason for this is that to properly construct home build equipment, a greater technical knowledge is required than the Foundation course would provide, and there is a risk that the equipment may cause interference to other radio users.
- Q9. What costs will be involved with attending the training course?

- A. This will probably be based on recovering the administrative costs of running the course. For example, one club may have to hire a hall, while another might have facilities available that they would not charge for.
- Q10. What is the fee for the Foundation Licence?
- A. The annual fee will be £15, but the licence will be free to those aged under 21 or 75 years or over.
- Q11. Are there any age restrictions to taking the test?
- A. No if you are good enough to pass, we feel that you are entitled to hold a licence.
- Q12. How much will it cost to operate as a Foundation licensee?
- A. This depends on you. There is a wide range of radio equipment commercially available, at different prices. You will have to decide how much you wish to spend on your hobby. A cheap way to start would be to join a local amateur radio club, where you may be able to use existing equipment, or purchase suitable second hand amateur radio equipment.
- Q13. What callsign will be available to me?
- A. The callsign prefix M3 has been chosen. You can ask if a particular callsign is available, for example if it matches your name e.g. M3 SID. However, combinations that could cause offence will not be permitted. Callsigns will be allocated on a first come, first served basis and may not be reserved.
- Q14. Does my licence allow anyone else to operate my radio station?
- A. No-one may transmit under your supervision.

Licensed amateurs may operate your radio station under their own callsign, using the suffix /P and entering the details in their own logbook.

- Q15. How much further can I progress in the Amateur Hobby?
- A. There will be two further stages that you can progress to An Intermediate Licence and a Full licence. Each licence will require you to obtain more detailed knowledge of different aspects of radio, and take additional examinations. The syllabi for these two licences has not yet been

agreed, but they will roughly equate as follows:

The Intermediate licence equates to the current Novice Licence Class.

The Full licence would equate to the Class A licence.

Q16. When will these new licence classes be introduced?

A. A pilot scheme for the Foundation Licence started in October, and if this goes well, the Foundation licence will be introduced in January 2002.

The Intermediate licence will be come into force on 1 October 2001. Although the syllabus will be developed over the next 12 months, taking the existing Novice licence examination will result in your being granted an Intermediate licence, until the new Intermediate course has been established. In the same vein, if you pass the RAE and the 5 words per minute Morse test, you will be granted a Full licence, which equates to the existing Class A Amateur licence.

Q17. Will the Morse requirement remain after the World Radio Conference in 2003 (WRC 2003)?

A. Whilst it is expected that WRC2003 will remove the Morse requirement there is always the possibility that it will not. The UK has an obligation to abide by the International Radio Regulations.

If it is abolished is likely that the 'A' and 'B' class distinction in the current Intermediate and Full licences will be removed.

Q18. Will I still be able to use Morse if the requirement is removed?

A. Yes, Morse will still be allowed but will not be compulsory. Many people enjoy using Morse and seek to improve their skills. The RSGB will continue to run the Morse training schools.

Q19. Can existing Novices and Full Class B Radio Amateurs gain access to HF?

A. Yes, if they take the Morse part of the Foundation course. They will then be allowed to operate as Foundation Licensees, accessing HF under the same restrictions as the Foundation Licence terms and conditions. In order to obtain a Foundation Licence, Radio Amateurs who have held their Novice or Class B licence for not less than 12 months need only take the Foundation Licence Morse Assessment. Novice and Class B licensees operating in the HF

bands must abide by the terms and conditions of their Foundation Licence and <u>must only</u> use their Foundation callsign.

Q20. I am an existing Amateur. Is not the introduction of the Foundation Licence lowering the entry standards for Amateur Radio?

A. Clause 1(1) of the Amateur licence makes it clear that Amateur Radio is a service of self - training. The Agency and the RSGB believes that a sensible balance needs to be struck between an entry hurdle that is high enough to ensure levels of safety and competence, and yet is not so high as to discourage those who, with the right encouragement, will go on to progress up the licensing structure to Intermediate or Full level. It is this balance that the Foundation Licence seeks to achieve.

Q21 I understand that there has been a change in the Class A and A/B licence structure - can you explain what has happened?

A. CEPT have adopted a recommendation to reduce the Morse requirement for a Class 1 European Licence (equivalent to our Class A Licence) from 12 to 5 words per minute. This in effect has removed any distinction between the licence classes A and A/B and they have been merged into a single, Class A licence. Those who currently hold an A/B licence will automatically be upgraded to allow all of the privileges held by a Class A licensee. Holders of A/B licences (or Class A licensees who hold both) have been given the option of changing their callsign from M5 to M0. Licensees cannot retain both call signs, as it is not allowed to have two call signs for the same licence class, and will have to relinquish one of their callsigns.

For further information, please contact:

Amateur and Citizens' Band Licensing Section Tel. 0207 211 0539
E-mail: Amateurcb@ra.gsi.gov.uk
Web site www.radio.gov.uk